FILED28 JAN '16 15:26USDC-ORP

Denise Subramaniam Self-represented 13865 SW Walker Rd Beaverton OR 97005 503-764-5300

## UNITED STATES DISTRICT COURT DISTRICT OF OREGON PORTLAND DIVISION

LNV CORPORATION

Plaintiff,

v.

**DENISE SUBRAMANIAM** 

pro per

**Defendant** 

Civil Case No. 3:14-cv-01836

AFFIDAVIT OF DENISE
SUBRAMANIAM IN SUPPORT
OF MOTION FOR TEMPORARY
RULE 65(B) INJUNCTIVE RELIEF

AFFIDAVIT OF DENISE SUBRAMANIAM

STATE OF OREGON COUNTY OF WASHINGTON

## **AFFIDAVIT**

I Denise Subramaniam am over the age of eighteen (18) years. I reside in Beaverton Oregon and have never been convicted of a crime. I'm fully competent to make this affidavit. The testimony contained herein is of my personal knowledge and experience. I swear under the penalty of perjury and under the laws of Oregon and the United States that my testimony herein is true and accurate.

On or around 1/27/2016 I discovered that the instruments Plaintiff LNV submitted as exhibits to its foreclosure complaint and its motion for summary judgment that it claimed to be a "true and accurate copis" of the "original" note, allonge and assignment of deed of trust cannot possibly be genuine.

Dana Lantry endorsed the questioned Note as "Asst. Vice President" of People's Choice Home Loan, Inc. On June 28, 2006 an assignment of deed of trust was recorded with Defendant's county also endorsed by Dana Lantry which was executed on 12/29/2005 and purports to convey beneficial interest in the deed of trust from People's to <a href="Homecomings Financial Network, Inc.">Homecomings Financial Network, Inc.</a>
Dana Lantry also purportedly endorsed as "Vice President" of People's Choice Home Loan, Inc., allonge that purports to convey beneficial interest to <a href="Residential Funding Company LLC">Residential Funding Company LLC</a>.

These facts on the face of these three instruments submitted into court record by Plaintiff LNV support Defendant's claim that LNV manufactured what it submitted to the court as the "original" Note and its allonges after May 2013 and before November 2014 with intent to deceive and falsely imply a "cure" of the fatal break in Defendant's chain of title pointed out in the Paatalo declaration.

Affiant and the other Beal victims have named Judge Mosman and three other federal judges and four state judges as co-conspirators in a formal criminal complaint filed with the FBI. A copy of this complaint has been mailed to James B. Comey, Director of the FBI; and has been, or is being, hand delivered to local FBI field offices in more than a dozen states where the Beal victims live. Our complaint is for prohibited RICO activities and for conspiracy to deprive us of our civil rights under color of law.

I am disabled, I have been known to be disabled, and the United States recignises me as a disabled person. My home provides accommodation for my disabilties pursuant to the ADA and Fair Housing Act; the loss of my home would cause me to suffer debilitaing phycial injury; and it is nearly impossible for someone with my disabilties to find housing that accommodates my. special needs.

An unconstitutional and wrongful sale of my property would cause me to suffer irreparable harm. I've motioned the court for temporary stay of a sheriff's sale of my home scheduled for tomorrow. There is no time to notify opposing counsel; and may not be in my interests. As a pro se, disabled litigant, I've been terribly disadvantaged in this case. I've motioned for 14 days temporary injunctive relief; in the hopes I'll be able to find counsel to represent me at a hearing for preliminary injunctive relief; and to pursue my Rule 6 motion for relief.

Further Affiant sayeth not.

Denise Subramaniam 13865 SW Walker Rd Beaverton OR 97005

503-764-5300

Personally appeared before me, a notary public in and for Washington county Oregon, the above

signed Denise Subramaniam on the 28 day of September, 2015.

Notary Public, State of Oregon

